

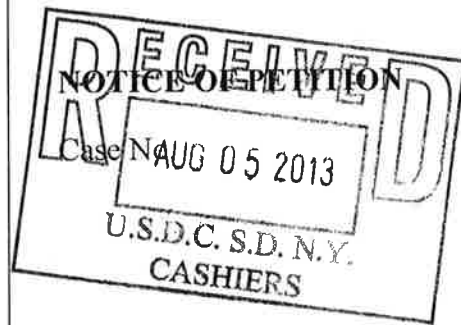
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**13 CIV 5460**

*Attorneys for Petitioners Peter E. Deutsch and Receiver Robert Seiden*

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PETER E. DEUTSCH,  
Plaintiff/Petitioner, and  
RECEIVER ROBERT SEIDEN,  
Plaintiff/Petitioner,  
vs.  
ZST DIGITAL NETWORKS, INC.,  
Defendant/Respondent,  
and  
KING & WOOD MALLESONS,  
Garnishee.



**PLEASE TAKE NOTICE** that, upon the accompanying Verified Petition for Special Proceeding and Turnover of Judgment Debtors' Property, Including Property Held By Garnishee filed on August 5, 2013, the annexed affirmation of David Graff, dated August 5, 2013 together with the exhibits annexed thereto and made a part thereof, petitioners **PETER E. DEUTSCH and RECEIVER ROBERT SEIDEN**, by its attorneys, Anderson Kill & Olick, P.C., shall move the United States District Court for the Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York, on August 19, 2013 at 4:00 pm, or as soon thereafter as counsel may be heard, for an order, pursuant to Federal Rules of Civil Procedure 69, N.Y. Civil

Practice Law and Rules ("CPLR") Articles 4 and 52, as and for its Verified Petition for Special Proceedings and Turnover of Judgment Debtor's Property Held by Garnishee, King & Wood Mallesons LLP ("King & Wood" or "Garnishee"), and for such other, further or different relief as this Court deems just proper and equitable.

Dated: New York, New York  
August 5, 2013

**ANDERSON KILL & OLICK, P.C.**

By:

  
David Graff, Esq.  
Shveta Kakar, Esq.

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Peter E. Deutsch and  
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Wilmington, Delaware 19808

**To:**  
**King & Wood Mallesons**  
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New York, NY 10022